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12 **Attorneys for Defendants**
13 **TWG Management, LLC and Tom**
14 **Wackman**

15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 JGSM ENTERTAINMENT CORP., a
18 Delaware corporation,

19 Plaintiff,
20 vs.

21 TWG MANAGEMENT, LLC, a Nevada
22 limited liability company; TOM
23 WACKMAN, an individual resident of
Wisconsin,

24 Defendants.

CASE NO.: 2:17-cv-02915-KJD-NJK

25 **STIPULATION TO EXTEND
DEADLINES TO PLAINTIFF'S
RENEWED MOTION TO LIFT STAY
[ECF No. 50] AND MOTION FOR ENTRY
OF CLERK'S DEFAULT [ECF No. 52]**

26 **(First Request)**

27 Pursuant to LR IA 6-1, Defendants TWG Management, LLC and Tom Wackman
28 (collectively, "TWG Defendants"), and Plaintiff JGSM Entertainment Corp., by and
29 through their respective Counsel, hereby stipulate, agree, and request that this Court extend the
30 response and reply deadlines for Plaintiff JGSM's Renewed Motion to Lift Stay, (ECF No.
31 50), filed on March 18, 2021, and Motion for Entry of Clerk's Default, (ECF No. 52), filed
32 on March 19, 2021, as additional time is needed to prepare:

33 1. The parties agree to extend the deadline for TWG Defendants' response to

1 Plaintiff's Renewed Motion to Lift Stay, (ECF No. 50), to seven (7) days from
2 today: April 9, 2021.

3 2. The parties agree to extend the deadline for TWG Defendants' response to
4 Plaintiff's Motion for Entry of Clerk's Default, (ECF No. 52), to seven (7) days
5 from today: to April 9, 2021.

6 3. The parties agree the extend the deadline for Plaintiff JGSM to file a reply in
7 support of the Motions, (ECF Nos. 50, 52), to ten (10) days after TWG
8 Defendants file their responses: to April 20, 2021.

9 This request for an extension is made in good faith. This is the parties' first request to
10 extend these deadlines, and the extensions will allow the parties necessary time to properly brief
11 issues in the Motions in light of TWG Defendants' counsel, Kaempfer Crowell,
12 recent appearance in this case and now having notice of all deadlines.

13 THE AMIN LAW GROUP, NV. LTD.

14 DATED this 2nd day of April, 2021.

15
16 By: 
17 Ismail Amin, Esq., No. 9343
18 3753 Howard Hughes Parkway, Ste 200
19 Las Vegas, NV 89169
20 Telephone: 702.954.3861
21 Facsimile: 702.441-2488
22 **Attorney for Plaintiff**
23 **JGSM Entertainment Corporation**

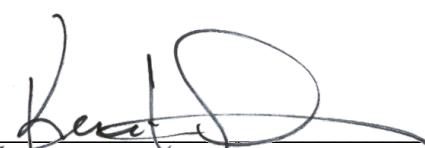
KAEMPFER CROWELL

DATED this 2nd day of April, 2021.

By: 
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Bryan M. Viellion, No. 13607
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Attorneys for Defendants
TWG Management, LLC and Tom Wackman

21
22 **IT IS SO ORDERED.**

23 Dated this 5th day of April, 2021.

24 
UNITED STATES DISTRICT COURT JUDGE